

1 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2 REGION 9
3

4 In the matter of:)

5 San Fernando Valley Superfund Site)
6 Area 1, Burbank Operable Unit)

7 RESPONDENT:)

8 Pacific Airmotive Corporation)
9 2940 and 3003 North Hollywood Way)
Burbank, California 91505)

U.S. EPA Docket
No. 94-10

10 Proceeding Under Section 106(a) of the)
11 Comprehensive Environmental Response,)
12 Compensation, and Liability Act of 1980)
(42 U.S.C. §9606(a)).)

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15 ADMINISTRATIVE ORDER FOR
16 PARTIAL REMEDIAL INVESTIGATION
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I. AUTHORITY

This Administrative Order ("Order") is issued on this date pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §106(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA"). The President delegated this authority to the Administrator of the United States Environmental Protection Agency ("EPA" or "Agency") by Executive Order No. 12580, 52 Fed. Reg. 2923 (January 23, 1987), and further delegated it to the Assistant Administrator for Solid Waste and Emergency Response and the Regional Administrators by EPA Delegation Nos. 14-8-A and 14-14-C. This authority has been redelegated to the Director, Hazardous Waste Management Division, EPA, Region 9 ("Director") by Region 9 Delegations Nos. 1290.41 and 1290.42.

II. DEFINITIONS

A. The "San Fernando Valley Superfund Sites, Areas 1-4" are located in Los Angeles County in Southern California. These consist of four areas of groundwater contamination listed on the National Priorities List. Included within the sites are significant portions of the cities of Los Angeles, Burbank, and Glendale.

B. The "Burbank Operable Unit" consists of the areal extent of groundwater contaminated with hazardous substances that is presently located in the vicinity of the Burbank Well Field and includes any areas to which such contamination migrates. The Burbank Operable Unit, along with the North Hollywood Operable

Unit, are part of the North Hollywood Area Superfund Site, also known as "San Fernando Valley Superfund Site, Area 1."

C. The "Pacific Airmotive Corporation Site", or "Site", is the property located at 2940 and 3003 North Hollywood Way in Burbank, California. Pacific Airmotive Corporation owns and operates the Site. The Pacific Airmotive Corporation Site includes the unsaturated and saturated zones below the surface of the property as well as adjacent areas to which hazardous substances have migrated. The Pacific Airmotive Corporation Site is located within the Burbank Operable Unit of the San Fernando Valley Superfund Site, Area 1.

D. "Day" means calendar day unless otherwise noted in this Order.

III. PARTIES BOUND

A. This Order shall apply to and be binding upon Pacific Airmotive Corporation, a California corporation (date of incorporation September 12, 1967) ("Pacific Airmotive Corporation" or "Respondent"), its agents, successors, and assigns. No change in ownership or operational status will alter Respondent's obligations under this Order. Respondent shall provide a copy of this Order to all contractors, subcontractors, laboratories, and consultants that are retained by Respondent to perform the work required by this Order within five (5) days after the Effective Date of this Order or within five (5) days of retaining their services. Notwithstanding the terms of any contract or agreement, Respondent is responsible for compliance with this Order and for ensuring that its employees, contractors, and agents comply with this Order.

1 B. Respondent shall not convey any title, easement, or
2 other interest it may have in any property comprising the Pacific
3 Airmotive Corporation Site, and Respondent shall not convey any
4 interest in the corporation, without a provision permitting the
5 continuous implementation of the provisions of this Order.
6 Respondent shall provide a copy of this Order to any subsequent
7 owner(s) or successor(s) before any ownership rights are
8 transferred. Respondent shall advise EPA in advance of any
9 anticipated transfer of interest.

10 IV. FINDINGS OF FACT

11 A. In a response, dated June 13, 1988, to an EPA Request
12 for Information pursuant to CERCLA §104(e), 42 U.S.C. §9604(e),
13 (hereinafter referred to as "EPA Questions"), Pacific Airmotive
14 Corporation described itself as a commercial aircraft engine
15 maintenance and service facility. In this same response,
16 Respondent stated that it purchased the property at 2940 and 3003
17 North Hollywood Way in 1947, and has operated at those locations
18 since 1947.

19 B. In a response, dated August 4, 1989, to an EPA Special
20 Notice letter, Pacific Airmotive Corporation identified the
21 property at 2940 North Hollywood Way as its main facility, and
22 identified the property at 3003 North Hollywood Way as its jet
23 engine test cell facility. In this same response, Respondent
24 admitted that chlorinated solvents had been detected in soils at
25 the 2940 North Hollywood Way property.

26 C. In its response to EPA Questions, Respondent admitted
27 that it stores on-site, and uses on-site, various solvents,
28 including 1,1,1 - trichloroethane and methylene chloride.

1 Respondent also admitted to storing jet fuels and other chemicals
2 and wastes at the Site. In its response, Respondent identified
3 the presence at the Site of solvent degreasing and solvent part
4 cleaning areas, underground storage tanks, industrial waste
5 clarifiers, drainage sumps, and chemical/waste drum storage
6 areas.

7 D. According to information supplied to EPA by Respondent
8 and by the California Regional Water Quality Control Board, Los
9 Angeles Region ("Regional Board"), historically, there were at
10 least the following spills: one jet fuel spill incident at 3003
11 North Hollywood Way in 1984, and two jet fuel spill incidents at
12 2940 North Hollywood Way in 1990 and 1991. In all incidents, jet
13 fuels were discharged to soils underlying the surface of the
14 Site. Investigations undertaken by Respondent following these
15 spills detected jet fuel in soils at levels as high as 11,000
16 mg/kg at 2940 North Hollywood Way and 13,000 mg/kg at 3003 North
17 Hollywood Way. The depth of jet fuel contamination extended to
18 at least 50 feet below ground surface at 2940 North Hollywood Way
19 and 65 feet below ground surface at 3003 North Hollywood Way.

20 E. On December 29, 1987, Regional Board staff inspected the
21 Pacific Airmotive Corporation property at 2940 North Hollywood
22 Way and noted visible discharges at the chemical/waste storage
23 areas where the asphalt surface was observed to be cracked and
24 distressed. In addition, Regional Board staff observed that an
25 abandoned underground pipeline, that was located adjacent to the
26 solvent process area and that was used to transmit solvents, was
27 not properly capped to preclude access to the subsurface.

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1 F. On January 6, 1988, the Regional Board directed Pacific
2 Airmotive Corporation to conduct a soil assessment at the
3 chemical/waste storage areas and at the abandoned underground
4 pipeline at 2940 North Hollywood Way. During a study undertaken
5 in 1988, in response to the Regional Board's request, Respondent
6 detected tetrachloroethene ("PCE") in soils in the chemical/waste
7 storage areas at levels up to 170 ug/kg and trichloroethene
8 ("TCE") in soils at levels up to 29 ug/kg, in samples taken at a
9 maximum depth of five feet below ground surface. PCE was
10 detected in soils in the vicinity of the abandoned pipeline at
11 levels up to 3,200 ug/kg. Toluene, which is believed to be a
12 component of jet fuel used at the Site, was detected in soils at
13 the chemical/waste storage area at levels up to 570 ug/kg and at
14 the abandoned underground pipeline area at levels up to 460
15 ug/kg.

16 G. Further soil assessment conducted by Respondent in 1988
17 at the former location of three underground solvent storage tanks
18 at the 2940 North Hollywood Way property detected PCE in soils at
19 levels up to 380 ug/kg and TCE in soils at levels up to 11 ug/kg.
20 Toluene was detected in soils to a depth of fifty feet below
21 ground surface, which was the maximum depth sampled. The maximum
22 concentration of Toluene detected was 95 ug/kg.

23 H. On August 16, 1988, Regional Board staff visually
24 inspected the boiler blow-down drainage sump west of Building #2
25 at 2940 North Hollywood Way. Several small cracks were observed
26 in the sump. While overseeing the subsequent soil sampling
27 conducted by Respondent, Regional Board staff observed extremely
28 moist soils and high organic vapor analyzer readings at the sump.

I. On November 16, 1989, Regional Board staff visually inspected the industrial waste clarifier located at the northeast corner of the 2940 North Hollywood Way property. The inspection revealed that there were a number of leaks associated with the clarifier. There were no seals surrounding the influent and effluent piping leading to the clarifier. The piping was observed to be of the clay tile type, which is liquid permeable. The fourth stage of the clarifier, or sample box, appeared to be constructed of cement blocks without seals between each joint. According to information provided to EPA by the Regional Board, Pacific Airmotive Corporation is still operating the clarifier in the same configuration at the Site.

J. Despite the fact that chlorinated solvents have been detected in soils at the Site, and despite the likelihood that releases of solvents have occurred at the solvent degreaser, solvent part cleaning areas, solvent processing area, and floor sump within workshop buildings at the Site, Respondent has not conducted subsurface soil investigations in these areas.

K. At the Regional Board's request, Respondent initiated a groundwater monitoring program in 1987. This monitoring program was terminated by Respondent in 1992. PCE and TCE have been detected in all groundwater samples obtained from the Site at monitoring well locations MW-3 through MW-8. PCE has been detected in these monitoring wells at levels ranging from 35 ug/l to 6,100 ug/l. TCE has been detected at levels ranging from 10 ug/l to 540 ug/l. Jet fuel has been detected in two monitoring wells at the Site (MW-5 and MW-8) at levels ranging from 550 ug/l to 880 ug/l.

1 L. On December 23, 1992, February 5, 1993, and again on
2 March 19, 1993, the Regional Board directed Pacific Airmotive
3 Corporation to submit a workplan for conducting a soil gas
4 investigation at the Site. The Regional Board based this request
5 on field experience demonstrating that, in sandy, porous soils of
6 the type underlying the Site, vapor transport can be the major
7 mechanism leading to groundwater contamination.

8 M. On May 21, 1993, at Respondent's request, Regional Board
9 staff met with Pacific Airmotive Corporation's representatives to
10 discuss the issue related to soil gas investigation. In a
11 follow-up letter to the Regional Board, dated May 24, 1993,
12 Pacific Airmotive Corporation agreed that the meeting was
13 productive. However, in a subsequent letter dated June 25, 1993,
14 Respondent declined to conduct the soil gas investigation
15 requested by the Regional Board. To date, Pacific Airmotive
16 Corporation has not performed the requested investigation.

17 N. On March 1, 1993, the Regional Board directed Pacific
18 Airmotive Corporation to resume groundwater monitoring at the
19 Site. To date, Respondent has not acceded to this request.

20 O. In a letter dated April 12, 1993, EPA advised Pacific
21 Airmotive Corporation to comply with the Regional Board's
22 requirements regarding soil gas investigation. On June 29, 1993,
23 EPA met with Pacific Airmotive Corporation's legal counsel to
24 discuss the status of Respondent's cooperation with the Regional
25 Board. At that time EPA advised Pacific Airmotive Corporation
26 that EPA may invoke its enforcement authority in the event that
27 the Regional Board's requirements are not met by Respondent.

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1 P. In a July 22, 1993, letter to the Regional Board,
2 Pacific Airmotive Corporation stated that the June 29, 1993,
3 meeting with EPA was informative and productive. Respondent
4 claimed a willingness to cooperate with the Regional Board.
5 Despite this assertion, to date Respondent has neither conducted
6 the requested soil gas investigation nor resumed groundwater
7 monitoring at the Site.

8 Q. In a letter dated November 19, 1993, due to the fact
9 that Respondent had not initiated the studies required by the
10 Regional Board, EPA requested that Respondent submit to EPA and
11 the Regional Board a work plan for conducting a site-wide soil
12 gas investigation and for resuming groundwater monitoring at the
13 Site.

14 R. On December 13, 1993, Respondent submitted to EPA and
15 the Regional Board a work plan that proposed a limited soil gas
16 survey at the northeast corner of the property located at 2940
17 North Hollywood Way. The proposed survey did not include the
18 remainder of the property at 2940 North Hollywood Way, nor did it
19 include the property at 3003 North Hollywood Way. Respondent's
20 work plan did not propose groundwater monitoring.

21 S. On December 13, 1993, EPA and the Regional Board
22 rejected the work plan submitted by Respondent on that same date.
23 EPA notified Pacific Airmotive Corporation that it must submit a
24 revised plan including the more detailed investigation requested
25 by EPA and the Regional Board by December 17, 1993. In response,
26 in a letter dated December 16, 1993, Respondent refused to submit
27 a work plan corresponding to EPA's guidelines.

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1 T. On May 2, 1989, EPA sent a Special Notice letter
2 informing Pacific Airmotive Corporation that it is a potentially
3 responsible party with respect to the Burbank Operable Unit of
4 the San Fernando Valley Superfund Site, Area 1.

5 V. CONCLUSIONS OF LAW

6 A. The Pacific Airmotive Corporation Site is a "facility"
7 as defined in Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

8 B. Respondent is a "person" as defined in Section 101(21)
9 of CERCLA, 42 U.S.C. §9601(21).

10 C. Analyses of samples collected at the Site during past
11 investigations indicate the presence of TCE and PCE. These
12 substances, among others detected at the Site, are "hazardous
13 substance[s]" as defined in Section 101(14) of CERCLA, 42 U.S.C.
14 §9601(14).

15 D. The past, present, and potential migration of hazardous
16 substances from the facility constitutes an actual or threatened
17 "release" as defined in Section 101(22) of CERCLA, 42 U.S.C.
18 §9601(22).

19 E. Respondent currently operates and owns, and has owned
20 since 1947, the property located at 2940 and 3003 North Hollywood
21 Way in Burbank, California, at which hazardous substances have
22 come to be located. Thus, Respondent is an "owner" and
23 "operator" as those terms are defined in Section 101(20) of
24 CERCLA, 42 U.S.C. §9601(20).

25 F. Respondent is a potentially responsible party as
26 defined in Section 107(a) of CERCLA, 42 U.S.C. §9607(a).

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VI. DETERMINATIONS

A. The Director has determined that an actual or threatened release of hazardous substances from the Pacific Airmotive Corporation Site may present an imminent and substantial endangerment to the public health or welfare or the environment.

B. The actions required by this Order are necessary to protect the public health, welfare, and the environment.

C. If performed satisfactorily, the actions required by this Order are consistent with CERCLA and the National Contingency Plan, 40 C.F.R. Part 300 ("NCP").

VII. NOTICE TO THE STATE

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. §9606(a), EPA has notified the State of California of the issuance of this Order by providing the Regional Board with a copy of this Order.

VIII. WORK TO BE PERFORMED

A. General Provisions

1. All work shall be conducted in accordance with: CERCLA; the NCP; EPA "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (EPA, October 1988); "Preparation of a U.S. EPA Region 9 Field Sampling Plan for Private and State-Lead Superfund Projects (EPA, April 1990); U.S. EPA Region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects" (EPA, September 1989); any final amended or superseding versions of such documents provided by EPA; other applicable EPA guidance documents; and any report, document, or deliverable prepared by EPA because Respondent fails to comply with this Order.

1 2. All plans, schedules, and other reports that
2 require EPA's approval and are submitted by Respondent pursuant
3 to this Order are incorporated into this Order upon approval by
4 EPA.

5 3. All work performed by or on behalf of Respondent
6 pursuant to this Order shall be performed by qualified
7 individuals or contractors with expertise in hazardous waste site
8 investigation. The qualifications of the persons, contractors,
9 and subcontractors undertaking the work for Respondent shall be
10 subject to EPA review.

11 4. EPA will oversee Respondent's activities as
12 specified in Section 104(a)(1) of CERCLA, 42 U.S.C. §9604(a)(1).
13 Respondent will support EPA's initiation and EPA's conduct of
14 activities that are carried out as part of EPA's oversight
15 responsibilities.

16 5. To provide quality assurance, maintain quality
17 control, and satisfy chain of custody requirements, Respondent
18 shall: (a) use a laboratory that has a documented Quality
19 Assurance Program that complies with EPA guidance (EPA, September
20 1989); and (b) ensure that the laboratory used by Respondent for
21 analysis performs such analyses according to a method or methods
22 approved by EPA in the Field Sampling Plan or Quality Assurance
23 Project Plan to be submitted by Respondent.

24 B. Work and Deliverables

25 1. Based on the Findings of Fact, Conclusions of Law,
26 and Determinations, EPA hereby orders Respondent to perform the
27 following work, under the direction of the EPA's Remedial Project
28 Manager, and to comply with all the requirements of this Order.

Respondent will furnish all personnel, materials, and services needed, or incidental to, performing the Investigation, except as otherwise specified in the Order.

2. Respondent shall initiate activities necessary to determine the nature and extent of vapor and non-vapor phase contamination in the unsaturated (vadose) zone resulting from releases of hazardous substances at the Pacific Airmotive Corporation Site, which includes the properties at 2940 North Hollywood Way and at 3003 North Hollywood Way. Both the horizontal and vertical extent of contamination shall be determined across the entire Site. In addition, Respondent shall continue to monitor groundwater quality beneath the surface of the Site. The investigation shall include:

a. Preparation of a plot plan showing all locations, past and present, where solvents are or were stored, used, or disposed.

b. Groundwater monitoring as follows:

(1) Groundwater must be sampled from monitoring wells MW-3 through MW-8 according to the following schedule:

<u>Monitoring Frequency</u>	<u>Report Due</u>
March 1994	April 30, 1994
July 1994	August 31, 1994
October 1994	November 30, 1994
January 1995	February 28, 1995

(2) Groundwater samples must be analyzed for volatile organic constituents and aromatic hydrocarbons by EPA Methods

1 502.1/503.1 and for jet fuel by EPA
2 Method 8015 (Modified). Water samples
3 must be analyzed without dilution at
4 least once in order to detect other
5 constituents that may exist in low
6 concentrations in the groundwater. All
7 analytical results must be reported on
8 the Regional Board Laboratory Report
9 Forms 10A/10B.

10 (3) Groundwater samples must also be
11 analyzed for nitrogen and general
12 minerals during July 1994 and January
13 1995 sampling events.

14 (4) All supplementary laboratory QA/QC data
15 identified in Item No. 3 of Regional
16 Board's March 1, 1993, letter to Pacific
17 Airmotive Corporation must be provided.

18 c. Soil gas investigation as follows:

- 19 (1) A soil gas investigation must be
20 implemented at both Pacific Airmotive
21 Corporation locations, 2940 and 3003
22 North Hollywood Way, Burbank,
23 California.
- 24 (2) The soil gas investigation must be
25 carried out based upon the requirements
26 addressed in the Regional Board's Well
27 Investigation Program — Work Plan
28 Requirements for Active Soil Gas

1 Investigation. All analytical results
2 must be reported in the forms attached
3 in the requirements.

- 4 (3) The sampling grid must be distributed
5 over the entire area of both properties,
6 with tighter sampling grids applied at
7 all potential point source areas,
8 including underground storage tanks,
9 industrial waste clarifiers, sumps,
10 chemical/waste drum storage areas, and
11 industrial solvents degreasing and parts
12 cleaning areas. Multi-depth sampling
13 must also be applied to these areas to a
14 minimum of 15 feet below ground surface.
15 When potential source areas are located
16 within buildings, angled borings shall
17 be drilled to access the soil directly
18 beneath the source areas.
- 19 (4) A contingency plan must be included to
20 add additional sampling points in case
21 high concentrations of compounds are
22 detected during the investigation.
- 23 (5) Upon completion of the first phase of
24 the soil gas investigation, a
25 recommendation must be submitted
26 regarding the need to install nested
27 soil vapor probes. EPA and the Regional
28 Board will make a determination as to

1 whether nested soil vapor probes are
2 necessary.

- 3 (6) Upon completion of the first phase of
4 the soil gas investigation, a
5 recommendation must be submitted
6 regarding soil cleanup alternatives.
7 EPA and the Regional Board will make a
8 determination as to whether the
9 recommendations for soil cleanup are
10 sufficient.

11 3. Respondent must maintain field and laboratory
12 records and reports, including field logs, sample shipment
13 records, analytical results, and quality assurance reports, to
14 ensure that only validated analytical data are reported to and
15 utilized by EPA. Field logs must be utilized to document
16 observations, measurements, and significant events that occur
17 during field activities. Laboratory reports must document sample
18 custody, analytical responsibility, analytical results, adherence
19 to prescribed protocols, nonconformity events, corrective
20 measures, or data deficiencies. All laboratory analytical
21 results must be reported on Regional Board forms as specified in
22 Item 2 above. In addition, Respondent must establish a data
23 security system to safeguard chain-of-custody forms and other
24 project records to prevent loss, damage, or alteration of project
25 documentation.

26 4. Respondent shall: (a) provide notification to EPA
27 as described below; (b) prepare a Field Sampling Plan ("FSP");
28 (c) prepare a Quality Assurance Project Plan ("QAPP");

1 (d) prepare a Health & Safety Plan ("HSP"); and (e) prepare a
2 final Remedial Investigation Report ("RI report"). These
3 documents and actions are necessary to ensure that sample
4 collection and analytical activities are conducted in accordance
5 with technically acceptable protocols, that data quality
6 objectives are established and met, and to otherwise meet the
7 requirements of this Order. The FSP, QAPP, and HSP may be
8 submitted separately or as a single document. These tasks are
9 described below.

10 5. Respondent shall notify EPA in writing of the
11 name, title, and qualifications of the individual(s) who will be
12 responsible for carrying out the terms of this Order, and the
13 name(s) of all contractors or subcontractors. Notification will
14 be provided within fourteen (14) days after the Effective Date of
15 this Order.

16 6. If EPA disapproves any person's or contractor's
17 technical or experience qualifications, EPA will notify
18 Respondent in writing, and Respondent shall subsequently notify
19 EPA, within fourteen (14) days of Respondent's receipt of EPA's
20 written notice, of the identity and qualifications of the
21 replacement(s). A subsequent EPA disapproval of the replace-
22 ment(s) shall be deemed a failure to comply with the Order.

23 7. Subsequent to approval by EPA of the individuals,
24 contractors, or subcontractors who will be responsible for the
25 investigation, Respondent may propose that different individuals,
26 contractors, or subcontractors direct and supervise the work
27 required by this Order. If Respondent wishes to propose such a
28 change, Respondent shall notify EPA in writing of the name,

1 title, and qualifications of the proposed individuals and the
2 names of proposed contractors or subcontractors. Any such
3 individual, contractors, or subcontractors shall be subject to
4 approval by EPA. EPA shall give Respondent its approval or
5 disapproval within fourteen (14) days of receiving from
6 Respondent the information required by this paragraph. The
7 naming of any replacement(s) by Respondent shall not relieve
8 Respondent of any of its obligations to perform the work required
9 by this Order. A subsequent EPA disapproval of the replace-
10 ment(s) shall be deemed a failure to comply with the Order.

11 8. Respondent shall prepare the FSP in accordance
12 with EPA guidelines (EPA, April 1990). The FSP must include:

13 a. A summary of the Pacific Airmotive
14 Corporation Site's geographic location and Site geology,
15 hydrogeology, and hydrology.

16 b. A summary of the Pacific Airmotive
17 Corporation's operational history, including the past and present
18 location of underground and above-ground tanks, baths, vapor
19 degreasers, clarifiers, or other structures where solvents are or
20 were used, stored, or discharged.

21 c. A compilation and review of all existing Site
22 data describing the types, locations, and quantities of hazardous
23 substances used or released at the Pacific Airmotive Corporation
24 Site, including a review of the results from previous sampling
25 and clean-up activities.

26 d. A detailed list of tasks to be performed to
27 fulfill the requirements of this Order.

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1 e. A description of sampling objectives; sample
2 location and frequency, including quality control samples,
3 sampling equipment, and methodologies; sample handling and
4 analysis; and other aspects of the work to be performed.

5 9. Where appropriate, Respondent shall use the
6 protocols and analytical methods addressed in documents included
7 in the Attachment. Respondent may cite relevant portions of
8 these documents in the FSP and QAPP. Respondent shall evaluate
9 and incorporate into the FSP or QAPP any necessary protocols and
10 analytical methods that are not addressed in documents included
11 in the Attachment.

12 10. The Draft FSP is due thirty (30) days after the
13 Effective Date of this Order. The Final FSP is due fifteen (15)
14 days after Respondent has received EPA comments on the Draft FSP.
15 EPA must review and approve the FSP and the QAPP before any field
16 activity is initiated.

17 11. Respondent shall prepare the QAPP in accordance
18 with EPA guidelines (EPA, September 1989). The QAPP must include
19 (to the extent not included in the FSP):

20 a. A description of data quality objectives.

21 b. A description of method(s) used in the
22 investigation to document and record compliance with field and
23 laboratory procedures (e.g., field logs, laboratory reports).

24 c. Information sufficient to demonstrate, to
25 EPA's satisfaction, that each laboratory used by Respondent is
26 qualified to conduct the proposed work (e.g., ability to meet
27 required detection and quantification limits for chemicals of
28 concern in the media of interest).

1 d. If the selected laboratory does not
2 participate in EPA's Contract Laboratory Program ("CLP"),
3 Respondent must submit documentation to demonstrate that the
4 laboratory uses methods consistent with CLP methods and quality
5 assurance requirements (e.g., detailed information to demonstrate
6 the adequacy of the laboratory's quality assurance program;
7 information on personnel qualifications, equipment, and material
8 specifications).

9 e. Assurances that EPA has access to laboratory
10 personnel, equipment, and records.

11 f. Other aspects of quality assurance not
12 addressed in the FSP.

13 12. Respondent may reference, rather than repeat,
14 information contained in the FSP or in documents listed in the
15 Attachment if the necessary techniques, protocols, and quality
16 assurance procedures are already described in those documents.

17 13. The Draft QAPP is due thirty (30) days after the
18 Effective Date of this Order. The Final QAPP is due fifteen (15)
19 days after Respondent has received EPA comments on the Draft
20 QAPP. EPA must review and approve the FSP and the QAPP before
21 any field activity is initiated.

22 14. Respondent shall prepare the HSP in conformance
23 with Respondent's health and safety program, and in compliance
24 with Occupational Safety & Health Act regulations and protocols.
25 The HSP must include the eleven (11) elements described in EPA
26 Guidance (EPA, October 1988), such as a health and safety risk
27 analysis, a description of monitoring and personal protective
28 equipment, and medical monitoring.

1 15. The HSP is due thirty (30) days after the
2 Effective Date of this Order.

3 16. The first phase of soil gas investigation field
4 work shall begin no later than thirty (30) days, and be completed
5 no later than ninety (90) days, after EPA has approved the FSP
6 and the QAPP.

7 17. Respondent must notify EPA of planned dates for
8 field activities at least one week before initiating sampling so
9 that EPA may adequately schedule oversight tasks.

10 18. Respondent will notify EPA in writing upon
11 completion of field activities.

12 19. After completing the first phase of soil gas
13 investigation field sampling and analysis, Respondent shall
14 prepare a draft RI report describing the results of the remedial
15 investigation. EPA guidance (EPA, October 1988) provides an
16 outline of the RI report format and contents. The RI report
17 should:

18 a. Include a review of all investigative
19 activities that have taken place.

20 b. Include an analysis and evaluation of the
21 data to describe physical characteristics of the Pacific
22 Airmotive Corporation Site, contaminant source characteristics,
23 the nature and extent of contamination in the unsaturated zone,
24 and contaminant fate and transport.

25 c. Describe and display data that document the
26 location, types, physical state, and concentration of
27 contaminants at the Pacific Airmotive Corporation Site.

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1 d. Include an analysis and evaluation of all
2 available groundwater monitoring data to describe the nature and
3 extent of contamination in the groundwater beneath the surface of
4 the Site.

5 e. Demonstrate that quality assurance require-
6 ments approved by EPA and specified in the FSP and QAPP are met.

7 f. Include as appendices a summary of all
8 validated data, field logs, chain of custody forms, and any other
9 information used to document the findings of the remedial
10 investigation.

11 20. The Draft RI report is due to EPA forty-five (45)
12 days after the first phase of soil gas investigation field work
13 is completed. Respondent shall prepare a final RI report that
14 satisfactorily addresses EPA's comments within twenty-one (21)
15 days after Respondent receives EPA's comments on the Draft RI
16 report.

17 21. With the exception of the HSP, EPA shall review,
18 comment, and approve or disapprove each plan, report, or other
19 deliverable submitted by Respondent. All EPA comments on draft
20 deliverables shall be incorporated by Respondent. EPA intends to
21 review all plans (with the exception of the HSP), reports, or
22 other deliverables within thirty (30) days of receipt of each
23 document. EPA shall notify Respondent in writing of EPA's
24 approval or disapproval of a final deliverable or if EPA requires
25 additional review time. In the event of any disapproval, EPA
26 shall specify the reasons for such disapproval, EPA's required
27 modifications, and a time-frame for submission of the revised
28 report, document, or deliverable. If the modified report,

1 document, or deliverable is again disapproved by EPA, EPA shall
2 first notify Respondent and then may draft its own report,
3 document, or deliverable and incorporate it as part of this
4 Order, or seek penalties from Respondent for failing to comply
5 with this Order, or conduct the remaining work required by this
6 Order.

7 22. All documents, including technical reports and
8 other correspondence to be submitted by Respondent pursuant to
9 this Order, shall be sent by U.S. mail to the following
10 addressees, and to such other addressees as EPA hereafter may
11 designate in writing, and shall be deemed submitted on the date
12 received by EPA:

13 a. Respondent shall submit two (2) copies of
14 each document that it is required to submit to EPA pursuant to
15 this Order to:

16 Dave Seter
17 Remedial Project Manager (H-6-4)
18 Hazardous Waste Management Division
19 U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105
Phone: (415) 744-2260

20 b. Respondent shall submit one (1) copy of each
21 document that it is required to submit pursuant to this Order to:

22 Dr. Robert Ghirelli
23 California Regional Water Quality Control Board
101 Centre Plaza Drive
24 Monterey Park, California 91754

25 **IX. SAMPLING, ACCESS, AND DATA/DOCUMENT AVAILABILITY**

26 A. At the request of EPA, Respondent shall provide to EPA
27 or its authorized representatives split samples or duplicates of
28 samples collected by Respondent as part of the investigation.

1 B. Nothing in this Order shall be interpreted as limiting
2 EPA's inspection or information-gathering authority under federal
3 law.

4 C. EPA personnel or EPA authorized representatives shall
5 be allowed access to the laboratory and personnel used by
6 Respondent for laboratory analyses.

7 D. For purposes of this Order, EPA's authorized
8 representatives shall include, but not be limited to, staff of
9 the Regional Board and consultants and contractors hired by EPA
10 to oversee activities required by this Order.

11 X. OTHER APPLICABLE LAWS

12 A. Respondent shall undertake all actions required by this
13 Order in accordance with the requirements of all applicable
14 local, state, and federal laws and regulations unless an
15 exemption from such requirements is specifically provided under
16 CERCLA or unless Respondent obtains a variance or exemption from
17 the appropriate governmental authority.

18 B. Any materials removed from the Pacific Airmotive
19 Corporation Site shall be disposed of or treated at a facility in
20 accordance with Section 121(d)(3) of CERCLA, 42 U.S.C.
21 §9621(d)(3).

22 XI. RECORD PRESERVATION

23 Respondent shall maintain, during the pendency of this Order
24 and for a minimum of ten (10) years after EPA provides notice to
25 Respondent that the work has been completed, a central depository
26 of the records and documents required to be prepared under this
27 Order. In addition, Respondent shall retain copies of the most
28 recent version of all documents that relate to hazardous

1 substances at the Pacific Airmotive Corporation Site and that are
2 in its possession or in the possession of its employees, agents,
3 contractors, or attorneys. After this ten year period,
4 Respondent shall notify EPA at least thirty (30) days before the
5 documents are scheduled to be destroyed. If EPA so requests,
6 Respondent shall provide these documents to EPA.

7 XII. DESIGNATED PROJECT MANAGERS

8 A. EPA designates David Seter, an employee of Region 9 of
9 EPA, as its Remedial Project Manager ("RPM") who shall have the
10 authorities, duties, and responsibilities vested in the RPM by
11 the NCP. Within fifteen (15) days of the Effective Date of this
12 Order, Respondent shall designate a Project Coordinator who shall
13 be responsible for overseeing Respondent's implementation of this
14 Order. The EPA RPM will be EPA's designated representative at
15 the facility. To the maximum extent possible, all oral
16 communications between Respondent and EPA concerning the
17 activities performed pursuant to this Order shall be directed
18 through EPA's RPM and Respondent's Project Coordinator. All
19 documents, including progress and technical reports, approvals,
20 and other correspondence concerning the activities performed
21 pursuant to the terms and conditions of this Order, shall be
22 delivered in accordance with Paragraph VIII.B.22.

23 B. EPA and Respondent may change their respective RPM and
24 Project Coordinator. Such a change shall be accomplished by
25 notifying the other party in writing at least seven (7) days
26 prior to the change except in the case of an emergency, in which
27 case notification shall be made orally followed by written
28 notification as soon as possible.

1 C. Consistent with the provisions of this Order, the EPA
2 RPM shall also have the authority vested in the On-Scene
3 Coordinator ("OSC") by the NCP, unless EPA designates a separate
4 individual as OSC, who shall then have such authority. This
5 authority includes, but is not limited to, the authority to halt,
6 modify, conduct, or direct any tasks required by this Order or
7 undertake any response actions (or portions of the response
8 action) when conditions present or may present a threat to public
9 health or welfare or the environment as set forth in the NCP.

10 D. The absence of the EPA RPM or the OSC from the Pacific
11 Airmotive Corporation Site shall not be cause for the stoppage of
12 work. Nothing in this Order shall limit the authority of the EPA
13 RPM or OSC under federal law.

14 XIII. MODIFICATION OF WORK REQUIRED

15 A. In the event of unanticipated or changed circumstances
16 at the Site, Respondent shall notify the EPA RPM by telephone
17 within twenty-four (24) hours of discovery of the new or changed
18 circumstances. This verbal notification shall be followed by
19 written notification postmarked within three (3) days of
20 discovery of the new or changed circumstances.

21 B. The Director may determine that in addition to tasks
22 addressed herein, additional work may be required. Where consis-
23 tent with Section 106(a) of CERCLA, the Director may direct as an
24 amendment to this Order that Respondent perform response actions
25 in addition to those required herein. Respondent shall implement
26 the additional work that the Director identifies. The additional
27 work shall be completed according to the standards, specifica-
28 tions, and schedules set forth by the Director.

XIV. SITE ACCESS

A. Respondent shall permit EPA and its authorized representatives to have access at all times to the Pacific Airmotive Corporation Site, to monitor any activity conducted pursuant to this Order, and to conduct such tests or investigations as EPA deems necessary. Nothing in this Order shall be deemed a limit upon EPA's authority under federal law to gain access to the Pacific Airmotive Corporation Site.

B. To the extent that Respondent requires access to land other than land it owns in carrying out the terms of this Order, Respondent shall, within forty-five (45) days of the Effective Date of this Order, obtain access for EPA, its contractors, and oversight officials; Regional Board oversight officials and contractors; and Respondent or its authorized representatives. If Respondent fails to gain access within forty-five (45) days, it shall continue to use best efforts to obtain access until access is granted. For purposes of this paragraph, "best efforts" includes, but is not limited to, seeking judicial assistance and the payment of money as consideration for access. If access is not provided within the time-frame referenced above, EPA may obtain access under Sections 104(e) or 106(a) of CERCLA.

XV. DELAY IN PERFORMANCE

A. Any delay in performance of this Order that, in EPA's judgment, is not properly justified by Respondent under the terms of this Section shall be considered a violation of this Order. Any delay in performance of this Order shall not affect Respondent's obligations to fully perform all obligations under the terms and conditions of this Order.

1 B. Respondent shall notify EPA of any delay or anticipated
2 delay in performing any requirement of this Order. Such notifi-
3 cation shall be made by telephone to EPA's RPM within forty-eight
4 (48) hours after Respondent first knew or should have known that
5 a delay might occur. Respondent shall adopt all reasonable
6 measures to avoid or minimize any such delay. Within three (3)
7 days after notifying EPA by telephone, Respondent shall provide
8 written notification fully describing the nature of the delay,
9 any justification for delay, any reason why Respondent should not
10 be held strictly accountable for failing to comply with any
11 relevant requirements of this Order, the measures planned and
12 taken to minimize the delay, and a schedule for implementing the
13 measures that will be taken to mitigate the effect of the delay.
14 Increased costs or expenses associated with implementation of the
15 activities called for in this Order are not justifications for
16 any delay in performance.

17 C. If Respondent is unable to perform any activity or
18 submit any document within the time required under this Order,
19 Respondent may, prior to the expiration of the time, request an
20 extension of time in writing. The extension request shall
21 include a justification for the delay. Submission of an
22 extension request shall not affect Respondent's obligation to
23 comply with the requirements of this Order.

24 D. If EPA determines that good cause exists for an
25 extension of time, it may grant a request made pursuant to
26 Subparagraph C above, and specify in writing a new schedule for
27 completion of the activity or submission of the document.

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XVI. ENDANGERMENT AND EMERGENCY RESPONSE

A. In the event of any action or occurrence during the performance of the work that causes or threatens to cause a release of a hazardous substance or that may present an immediate threat to public health or welfare or the environment, Respondent shall immediately take all appropriate action to prevent, abate, or minimize the threat, and shall immediately notify EPA's RPM, or, if the RPM is unavailable, EPA's OSC. If neither of these persons is available, Respondent shall notify the EPA Emergency Response Unit, Region 9, phone number (415) 744-2000. Respondent shall take such action in consultation with EPA's RPM and in accordance with all applicable provisions of this Order, including but not limited to the HSP.

B. Nothing in the preceding paragraph shall be deemed to limit any authority of the United States to take, direct, or order all appropriate action to protect human health and the environment, or to prevent, abate, or minimize an actual or threatened release of hazardous substances on, at, or from the Pacific Airmotive Corporation Site.

XVII. ASSURANCE OF ABILITY TO COMPLETE WORK

A. Respondent shall demonstrate its ability to complete the work required by this Order and to pay all claims that arise from the performance of the work by obtaining and presenting to EPA within thirty (30) days after approval of the FSP and QAPP, one of the following: (1) a performance bond, (2) a letter of credit, (3) a guarantee by a third party, or (4) internal financial information to allow EPA to determine that Respondent has sufficient assets available to perform the work. Respondent

1 shall demonstrate financial assurance in an amount no less than
2 the estimate of cost for the remedial investigation. If
3 Respondent seeks to demonstrate ability to complete the remedial
4 investigation by means of internal financial information or by
5 guarantee of a third party, it shall re-submit such information
6 monthly from the Effective Date of this Order. If EPA determines
7 that such financial information is inadequate, Respondent shall,
8 within fifteen (15) days after receipt of EPA's notice of
9 determination, obtain and present to EPA for approval one of the
10 other forms of financial assurance listed above.

11 B. At least seven (7) days prior to commencing any work at
12 the Pacific Airmotive Corporation Site pursuant to this Order,
13 Respondent shall submit to EPA a certification that Respondent or
14 its contractors and subcontractors have adequate insurance
15 coverage or have indemnification for liabilities for injuries or
16 damages to persons or property that may result from the
17 activities to be conducted by or on behalf of Respondent pursuant
18 to this Order. Respondent shall ensure that such insurance or
19 indemnification is maintained for the duration of performance of
20 the work required by this Order.

21 XVIII. DISCLAIMER

22 The United States, by issuance of this Order, assumes no
23 liability for any injuries or damages to persons or property
24 resulting from acts or omissions by Respondent, or its employees,
25 agents, successors, assigns, contractors, or consultants in
26 carrying out any action or activity pursuant to this Order.
27 Neither EPA nor the United States shall be held as a party to any
28 contract entered into by Respondent or its employees, agents,

1 successors, assigns, contractors, or consultants in carrying out
2 any action or activity pursuant to this Order.

3 **XIX. ENFORCEMENT AND RESERVATIONS**

4 A. EPA reserves the right to bring an action against
5 Respondent under Section 107 of CERCLA, 42 U.S.C. §9607, for
6 recovery of any response costs incurred by the United States
7 related to this Order and not reimbursed by Respondent. This
8 reservation shall include, but not be limited to, past costs,
9 direct costs, indirect costs, the costs of oversight, the costs
10 of compiling the cost documentation to support oversight cost
11 demand, as well as accrued interest as provided in Section 107 of
12 CERCLA, 42 U.S.C. §9607.

13 B. Notwithstanding any other provision of this Order, at
14 any time during the response action EPA may perform its own
15 studies, complete the response action (or any portion of this
16 response action) and seek reimbursement from Respondent for its
17 costs, or seek any other appropriate relief.

18 C. Nothing in this Order shall preclude EPA from taking
19 any additional enforcement action, including modification of this
20 Order, issuance of additional Orders or taking additional
21 remedial or removal actions as EPA may deem necessary, or from
22 requiring Respondent in the future to perform additional
23 activities pursuant to CERCLA or any other applicable law.
24 Respondent shall be liable under Section 107(a) of CERCLA, 42
25 U.S.C. §9607(a), for the costs of any such additional actions.

26 D. Notwithstanding any provision of this Order, the United
27 States hereby retains all of its information gathering,
28 inspection, and enforcement authorities and rights under CERCLA,

1 the Resource Conservation and Recovery Act, or any other
2 applicable statutes or regulations.

3 E. Notwithstanding compliance with the terms of this
4 Order, including the completion of an EPA-approved remedial
5 investigation, Respondent is not released from liability, if any,
6 for any enforcement actions beyond the terms of this Order taken
7 by EPA respecting the Pacific Airmotive Corporation Site or the
8 San Fernando Valley Superfund Sites, Areas 1-4.

9 F. EPA reserves the right to take any enforcement action
10 pursuant to CERCLA or any other legal authority, including the
11 right to seek injunctive relief, monetary penalties,
12 reimbursement of response costs, and punitive damages for any
13 violation of law or this Order.

14 G. EPA expressly reserves all rights and defenses that it
15 may have, including EPA's right both to disapprove work performed
16 by Respondent and to request that Respondent perform tasks in
17 addition to those detailed in this Order. EPA reserves the right
18 to undertake removal actions or remedial actions at any time.
19 EPA reserves the right to seek reimbursement from Respondent for
20 the costs incurred by the United States in removal and remedial
21 actions.

22 H. This Order does not release Respondent from any claim,
23 cause of action, or demand in law or equity, including, but not
24 limited to, any claim, cause of action, or demand that lawfully
25 may be asserted by representatives of the United States or the
26 State of California.

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1 I. No informal advice, guidance, suggestions, or comments
2 by EPA regarding reports, plans, specifications, schedules, or
3 any other writing submitted by Respondent will be construed as
4 relieving Respondent of its obligation to obtain such formal
5 approval as may be required by this Order.

6 **XX. NOTICE OF INTENT TO COMPLY**

7 Respondent shall, within two (2) days of the Effective Date
8 of this Order, provide written notice to EPA stating whether
9 Respondent will comply with the terms of this Order. Failure to
10 respond, or failure to agree to comply with this Order, shall be
11 deemed a refusal to comply with this Order.

12 **XXI. OPPORTUNITY TO CONFER**

13 A. Respondent may, within three (3) days of receipt of
14 this Order, request a conference with EPA's Director of the
15 Hazardous Waste Management Division, or whomever the Director may
16 designate. If requested, the conference shall occur within seven
17 (7) days of the request, unless extended by mutual agreement of
18 the Parties, at EPA's Regional Office, 75 Hawthorne Street, San
19 Francisco, California.

20 B. At any conference held pursuant to Respondent's
21 request, Respondent may appear in person, or be represented by an
22 attorney or other representative. If Respondent desires such a
23 conference, Respondent shall contact Thomas Mintz, Assistant
24 Regional Counsel, at (415) 744-1333.

25 C. The purpose and scope of any such conference held
26 pursuant to this Order shall be limited to issues involving the
27 implementation of the response actions required by this Order and
28 the extent to which Respondent intends to comply with this Order.

1 If such a conference is held, Respondent may present any
2 evidence, arguments, or comment regarding this Order, its
3 applicability, any factual determinations upon which the Order is
4 based, the appropriateness of any action that Respondent is
5 ordered to take, or any other relevant and material issue. Any
6 such evidence, arguments, or comments should be reduced to
7 writing and submitted to EPA within three (3) calendar days
8 following the conference. This conference is not an evidentiary
9 hearing, and does not constitute a proceeding to challenge this
10 Order. It does not give Respondent a right to seek review of
11 this Order, or to seek resolution of potential liability, and no
12 official stenographic record of the conference will be made. If
13 no conference is requested, any such evidence, arguments, or
14 comments must be submitted in writing within three (3) calendar
15 days following the Effective Date of this Order. Any such
16 writing should be directed to Thomas Mintz, Assistant Regional
17 Counsel, at the address cited above.

18 D. Respondent is hereby placed on notice that EPA will
19 take any action that may be necessary in the opinion of EPA for
20 the protection of public health or welfare or the environment,
21 and Respondent may be liable under Section 107(a) of CERCLA, 42
22 U.S.C. §9607(a), for the costs of those government actions.

23 XXII. SEVERABILITY

24 If any provision or authority of this Order, or the applica-
25 tion of this Order to any circumstance, is held by a court to be
26 invalid, the application of such provision to other circumstances
27 and the remainder of this Order shall not be affected thereby,
28 and the remainder of this Order shall remain in force.

XXIII. PENALTIES FOR NONCOMPLIANCE

Respondent is advised that, pursuant to Section 106(b) of CERCLA, 42 U.S.C. §9606(b), willful violation or subsequent failure or refusal to comply with this Order, or any portion thereof, may subject Respondent to a civil penalty of up to \$25,000 per day for each day in which such violation occurs, or such failure to comply continues. Failure to comply with this Order, or any portion thereof, without sufficient cause may also subject Respondent to liability for punitive damages in an amount three times the amount of any cost incurred by the government as a result of the failure of Respondent to take proper action, pursuant to Section 107(c)(3) of CERCLA, 42 U.S.C. §9607(c)(3).

XXIV. EFFECTIVE DATE

This Order is effective three (3) calendar days following receipt by Respondent unless a conference is requested as provided herein. If such a conference is requested, this Order shall be effective the second (2nd) calendar day following the day of such conference unless modified in writing by EPA.

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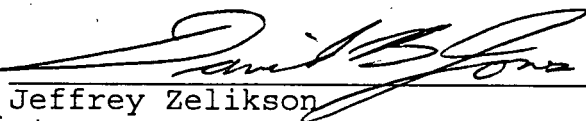
XXV. TERMINATION AND SATISFACTION

The provisions of this Order shall be deemed satisfied upon Respondent's receipt of written notice from EPA that Respondent has demonstrated, to the satisfaction of EPA, that all of the terms of this Order, including any additional tasks that EPA has determined to be necessary, have been completed.

IT IS SO ORDERED:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

By:


Jeffrey Zelikson

for Director

Hazardous Waste Management Division
U.S. EPA, Region 9

Date:

2/18/98

EPA Region 9 Contacts:

Dave Seter, Remedial Project Manager (H-6-4)
Hazardous Waste Management Division
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 744-2260

Thomas P. Mintz, Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 744-1333

ATTACHMENT

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the Investigation process:

The (revised) National Contingency Plan

"Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA," U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive No. 9355.3-01.

"Interim Guidance on Potentially Responsible Party Participation in Remedial Investigation and Feasibility Studies," U.S. EPA, Office of Waste Programs Enforcement, Appendix A to OSWER Directive No. 9355.3-01.

"A Compendium of Superfund Field Operations Methods," Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.

"EPA NEIC Policies and Procedures Manual," May 1978, revised November 1984, EPA-330/9-78-001-R.

"Data Quality Objectives for Remedial Response Activities," U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.

"U.S. EPA Region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects," 9QA-03-00, U.S. EPA Region 9 QAMs, September 1989.

"Users Guide to the EPA Contract Laboratory Program," U.S. EPA, Sample Management Office, August 1982.

"Health and Safety Requirements of Employees Employed in Field Activities," U.S. EPA, Office of Emergency and Remedial Response, July 12, 1981, EPA Order No. 1440.2.

OSHA Regulations in 29 CFR 1910.120 (Federal Register 45654, December 19, 1986).

Preparation of a U.S. EPA Region 9 Field Sampling Plan for Private and State-Lead Superfund Projects, Document Control Number 9QA-06-89, April 1990, U.S. EPA Region 9, Quality Assurance Management Section.